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FILED

AUG 27 2019 YJ

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

IGNACIO CRUZ,
also known as "Nuno"

19CR 680

Violations: Title 18, United States
Code, Sections 922(g)(1) and
2261A(2)

JUDGE WOOD

COUNT ONE

MAGISTRATE JUDGE KIM

The SPECIAL JUNE 2018 GRAND JURY charges:

On or about November 22, 2017, at Chicago, in the Northern District of Illinois,
Eastern Division,

IGNACIO CRUZ,
also known as "Nuno,"

defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, ammunition, namely, thirty rounds of .223 REM ammunition containing the headstamp "F C 223 REM," which ammunition had traveled in interstate commerce prior to defendant's possession of the ammunition;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWO

The SPECIAL JUNE 2018 GRAND JURY further charges:

During the period from on or about January 12, 2019, through and including March 3, 2019, in the Northern District of Illinois, Eastern Division, and elsewhere,

IGNACIO CRUZ,
also known as "Nuno,"

defendant herein, with the intent to kill, injure, harass, and intimidate another person, namely Victims A and B, did use an electronic communication service, electronic communication system of interstate commerce, and other facilities of interstate commerce, namely, cellular telephone networks and text messages, to engage in a course of conduct that placed Victims A and B in reasonable fear of death or serious bodily injury, and caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Victims A and B, and in doing so, caused serious bodily injury to Victim A and used a dangerous weapon during the offense;

In violation of Title 18, United States Code, Sections 2261(b)(3) and 2261A(2)(A) and (B).

COUNT THREE

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about March 6, 2019, at Chicago, in the Northern District of Illinois,
Eastern Division,

IGNACIO CRUZ,
also known as "Nuno,"

defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely, a black Glock, Model 22 Gen4, .40 caliber semi-automatic pistol with serial number VBX777, which firearm had traveled in interstate commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

The SPECIAL JUNE 2018 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 922(g), as set forth in this Indictment, defendant shall forfeit to the United States of America any firearm and ammunition involved in and used in any offense of conviction, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to,

a. thirty rounds of .223 REM ammunition containing the headstamp "F C 223 REM"; and

b. a black Glock, Model 22 Gen4, .40 caliber semi-automatic pistol with serial number VBX777.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY